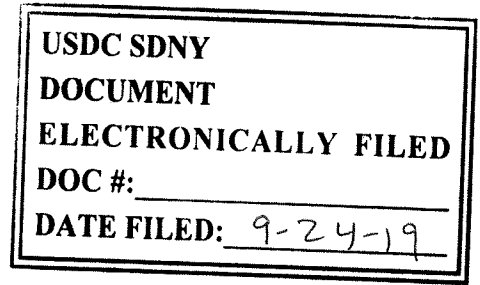


EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



H. CRISTINA CHEN-OSTER;
SHANNA ORLICH; ALLISON
GAMBA; and MARY DE LUIS,

Plaintiffs,

v.

GOLDMAN, SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.,

Defendants.

10 Civ. 6950 (AT) (RWL)

STIPULATION AND [PROPOSED] ORDER REGARDING DEPOSITIONS

WHEREAS, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs and Defendants (collectively, the "Parties") in the above-captioned action (the "Action"), by their counsel, have conferred;

NOW THEREFORE, the Parties hereby stipulate and agree, by their counsel and subject to the approval of the Court, as follows:

1. The Parties shall have the right to depose any witness designated by the opposing Party to testify at trial who has not been previously deposed in this Action. Any such depositions shall occur within a reasonable amount of time prior to the start of trial and no later than three weeks prior to the start of trial, or as otherwise ordered by the Court.

DATED: New York, New York
September 24, 2019

Respectfully submitted,

/s/ Kelly M. Dermody

Adam T. Klein
Cara E. Greene
Melissa L. Stewart
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, New York 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060

Paul W. Mollica
161 North Clark Street, Suite 4700
Chicago, Illinois 60601
Telephone: (212) 809-7010
Facsimile: (312) 809-7011

Kelly M. Dermody (*admitted pro hac vice*)
Anne B. Shaver (*admitted pro hac vice*)
Tiseme G. Zegeye
LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Rachel Geman
250 Hudson Street, 8th Floor
New York, New York 10013-1413
Telephone: (212) 355-9500
Facsimile: (212) 355-9592

Attorneys for Plaintiffs

IT IS SO ORDERED.

DATED: 9/24/19

/s/ Amanda Flug Davidoff


Robert J. Giuffra, Jr.
Sharon L. Nelles
Ann-Elizabeth Ostrager
Hilary M. Williams
Joshua S. Levy
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Amanda Flug Davidoff
Elizabeth A. Cassady
SULLIVAN & CROMWELL LLP
1700 New York Avenue, N.W. Suite 700
Washington, DC 20006-5215
Telephone: (202) 956-7500

Barbara B. Brown (*admitted pro hac vice*)
Carson H. Sullivan (*admitted pro hac vice*)
PAUL HASTINGS LLP
875 15th Street, NW
Washington, DC 20005
Telephone: (202) 551-1700

Patrick W. Shea
PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6405

Attorneys for Defendants



THE HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE